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National Committeewoman

STEPHEN ROBERTS
National Committeeman

June 22, 2006

Lawrence H. Norton, Esq.
General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

MUR # 5768

2006 JUN 27 PM 10:03
RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Re: Complaint against Boswell for Congress

Dear Mr. Norton:

We respectfully file this complaint against Boswell for Congress, the principal campaign committee for Leonard Boswell, a candidate for the U.S. House of Representatives in Iowa's 3rd Congressional District, for alleged violations of federal law prohibiting the receipt of corporate in-kind contributions. The Commission has historically taken a dim view of the use of corporate resources in Federal elections. *See* MUR 5020 (Respondent Gormley for Senate Primary Election Fund, et al, total civil penalty of \$115,000) and MUR 5573 (Respondent Westar Energy, Inc., et al, total civil penalty of \$40,500).

As the Commission well knows, federal law prohibits corporate contributions to candidates running for Congress. 2 U.S.C. § 441(b) and 11 CFR § 114.2. Federal regulations also directly prohibit in-kind contributions from corporations to candidates for Congress. 11 CFR § 114.2(c).

Specifically in question is the existence of an invitation sent out by Jeffrey Strobburg, Chief Executive Officer of West Central Cooperative. *See* Exhibit A (Attached). West Central is a registered corporation according to the Secretary of State's website (www.sos.state.ia.us). The invitation was sent out on West Central letterhead and dated May 9, 2006. The invitation also lacked a federal election disclosure, as required by law.

The use of corporate letterhead to solicit funds is a violation under 2 U.S.C. § 441(b) and 11 CFR § 114.2.

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Moreover, there is no reference to any sort of receipt or disbursement to West Central in Leonard Boswell's financial disclosures filed with the Commission.

We respectfully request that the Commission investigate these issues, mandate the full disclosure of any corporate in-kind contributions, and penalize Boswell for Congress accordingly for any violations of the law.

Respectfully,



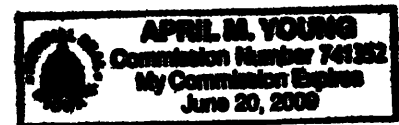
Cullen Sheehan
Executive Director
Republican Party of Iowa

State of Iowa
County of Polk

Signed and sworn to (or affirmed) before me on June 22, 2006

By Cullen Sheehan
Name(s) of Person(s)

April M Young
Signature of Notary Public
Notary Public
Title





May 9, 2006

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Dear [REDACTED]

You are invited to a luncheon reception sponsored by Larry Kallem and the agriculture cooperative community in honor of Congressman Leonard Boswell. Congressman Boswell has been a strong supporter of cooperatives, agriculture and the renewable fuels movement in Washington, DC. This lunch will provide a great opportunity to discuss issues and show your support for Congressman Boswell and encourage his further support of agriculture and renewable fuels.

Date: Tuesday, May 30, 2006
Time: 12 30 p.m. – 2 00 p.m.
Location: Tournament Club of Iowa
1000 Tradition Drive
Polk City, Iowa

Suggested Contribution.

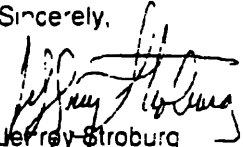
Individual	\$250.
PAC	\$1,000.

Please make checks payable to Boswell for Congress. Please keep in mind that corporate contributions are not permitted. Individuals are limited by law to a maximum contribution of \$4,200. This limit does not apply to PACs.

Please RSVP to Chris Cornelius at 712-667-3321 or chrisc@westcentral.net. If you are unable to come, we ask you to consider sending a check anyway - it would be much appreciated.

We are very excited about the opportunity to support Congressman Leonard Boswell and hope you share our enthusiasm. We look forward to seeing you on May 30, 2006!

Sincerely,


Jeffrey Stroburg
Chief Executive Officer

West Central
PO Box 66
East of the Sun
712-667-3321
Fax 712-667-3325
www.westcentral.com

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